b.) Remarks

Claims 1-9, 11-27 and 29-44 are currently pending. Claims 10 and 28 had been previously cancelled Applicants, without conceding to the correctness of the Examiner's objections and in the interest of expediting prosecution of the instant application, submits an amended claim set in order to more clearly define the claimed subject matter. Claims 1, 26, 39-42 and 44 have been amended. Support for these amendments can be found, for example, in paragraphs, 0040, 0041, 0047, and 0055 of the specification as filed. Claims 12, 13, 20, 22-25, 27, 29-38 and 43 have also been further amended to adjust dependencies. Applicants have taken care not to incorporate any new matter into this application by way of this amendment.

Rejection under 35 USC 103

Claims 1, 26, 42, 43, and 44

The Examiner has rejected claims 1-9, 11-27 and 27-44 under 35 USC 103(a) as being unpatentable over Stern et al (US 2002/0052928) ("Stern") in view of Kraft et al (US 2002/0147637) ("Kraft") and in further view of Garcia-Chiesa (US 2002/0099723) ("Garcia-Chiesa"). Applicants respectfully traverse and request reconsideration of this rejection for the reasons set out below.

As the Examiner is aware, Applicants addressed the Examiner's objections based on Stern in light of Kraft in their communication dated July 10, 2006. The Examiner has considered these arguments but has upheld the objection, alleging that Applicants' arguments are moot in view of the new rejection based on Garcia-Chiesa. The Examiner concedes that neither Stern nor Kraft disclose a system that dynamically creates one or more script URLs but alleges that this additional feature is disclosed by Garcia-Chiesa (referring to paras. 0030 and 0043). Applicants respectfully traverse the Examiner's allegation with regard to Garcia-Chiesa. Applicants respectfully submit that Garcia-Chiesa describes the dynamic creation of URLs, but not the dynamic creation of script

URLs. Furthermore, Garcia-Chiesa is directed specifically towards documents created using Lotus Domino web servers. The Examiner's attention is respectfully directed to paragraph 0015 of Garcia-Chiesa which states:

> "The present invention discloses a combination of technologies and procedures that bridges the gaps among 1) popular World Wide Web (hereinafter WWW) Search Engine Crawlers... 2) the output of the emitter module of the HTTP stack of a particular vendor implementation of a Web Server called Lotus Domino... Content stored by Domino servers are normally stored in files that have the extension ".NSF"... and 3) Internet users frustrated by a) normally not being able to find most relevant documents stored in .NSF containers due to the mismatch between 1 and 2..."

Applicants respectfully submit that Garcia-Chiesa is directed towards a specific solution to a problem created by a specific software package, namely that Lotus Notes/Domino generates URLs in a fashion that creates problems for web crawling applications (see paras. 0027, 0028). Applicants also submit that the teachings in Garcia-Chiesa are not applicable outside of the context of Lotus Domino web servers. As a result, Applicants respectfully submit that there would be no motivation to combine this application with either Kraft or Stern.

Applicants further respectfully submit that, even if Garcia-Chiesa were to be combined with Kraft and Stern, the result would not be the same as the subject application. This is because Garcia-Chiesa is directed towards a different kind of dynamic URL than that discussed in the subject application. Paragraph 0030 of Garcia-Chiesa states that "[w]hile WWW Search-Engines normally expect the sites to be primarily "static", [Lotus] Domino sites are inherently dynamic". Applicants respectfully submit, however, that in Garcia-Chiesa, the Lotus Domino site is described as "dynamic" because the URLs in the site and the content of the site are derived from the contents of the Lotus Notes database on

the server. The URLs that link the content within the site are generated on the server by Lotus Notes/Domino. The URLs would be said to be static if they corresponded directly to a file resident on the file system of a web server, since they do not they are dynamic.

Applicants respectfully submit that, by contrast, the present application describes, with reference to amended claim 1 as submitted herewith, "a script URL resolution component for loading said one or more webpages, causing examination of said one or more specific portions of script code selected during the crawling which are used to dynamically create one or more script URLs and causing execution of said one or more selected portions of the script code to obtain said one or more script URLs." Applicants respectfully submit that the phrase "dynamically create one or more script URLs" describes a completely different variety of dynamicism from that described in Garcia-Chiesa. In the case of the subject application, the process of dynamically creating URLs is accomplished by scripts located within the code that forms the webpage. Thus, with regard to the subject application, the script URLs are not created until the script is executed. However, once created, the script URL itself is static in that it corresponds directly to a file resident on the file system of a web server.

Applicants further respectfully submit that Garcia-Chiesa refers to creating URLs by examining the Lotus Notes/Domino database as part of a server-side process and converting the dynamic URLs into "special URLs" by assigning the document a unique logical name that describes its location on the database (see para. 0059). The subject application, on the other hand, is concerned specifically with script URLs and a means of discovering the URLs already embedded in a client script on a webpage that creates the URLs (see paras. 0028 and 0029).

Applicants respectfully submit that the teachings of Garcia-Chiesa are not applicable to the technical problem addressed in the subject application and that, as a result, it would not be obvious for a skilled technician to combine Garcia-Chiesa with Stern and Kraft. Furthermore, Applicants respectfully submit that even if such a combination were to take

place, the result would not equal the invention discussed in the subject application, nor would it render this invention obvious to a person of ordinary skill in the art in light of this unlikely combination.

With regard to the Examiner's objections based on Stern and Kraft, Applicants respectfully repeat and rely upon the arguments raised in their communication of July 10, 2006, namely that Stern teaches away from a URL resolution system that can execute script code contained on a webpage and that Kraft does not discuss the execution of only certain specific portions of the code that relate to dynamic URL creation. Nonetheless, in order to expedite prosecution of the present application and better define the scope of the protection being sought, Applicants have amended claims 1, 26, 39-42 and 44 for reasons of clarity only, further specifying the loading of the webpage by the script URL resolution component. Applicants therefore respectfully request withdrawal of the objections under USC 103(a) against these amended claims.

Claims 40 and 41

The Examiner has rejected claims 40 and 41 under 35 USC 103(a) as being unpatentable over Stern et al (US 2002/0052928) ("Stern") in view of Kraft et al (US 2002/0147637) ("Kraft"). Applicants respectfully repeat and rely upon the arguments raised in their communication of July 10, 2006, namely that Stern teaches away from a URL resolution system that can execute script code contained on a webpage and that Kraft does not discuss the execution of only certain specific portions of the code that relate to dynamic URL creation. Furthermore, the Examiner has conceded in discussing the subject matter of claim 1, currently on file, that neither Stern nor Kraft disclose a system that dynamically creates one or more script URLs, a feature included in claims 40 and 41. Applicants respectfully submit that combining the teachings of Stern and Kraft does not lead one of ordinary skill in the art to the invention recited in these claims. Nonetheless, in order to expedite prosecution of the present application and better define the scope of the protection being sought, Applicants have amended claims 40 and 41 for reasons of

clarity only, further specifying the loading of the webpage by the script URL resolution component. Accordingly, Applicants submit that the subject matter of amended claims 40 and 41 would not have been obvious to a person of ordinary skill in the art at the time of invention in light of the teachings of Stern and Kraft and, therefore, respectfully request withdrawal of the objections under USC 103(a) against these amended claims.

Claims 2-3, 5-9, 11-13, 15-25, 27-39

Claims 2-3, 5-9, 11-13, 15-25, and 27-39 depend on claim 1 or claim 26, respectively. Applicants refer the Examiner to its comments with regard to Stern, Kraft, and Garcia-Chiesa and respectfully requests withdrawal of the objections under USC 103(a) against these claims.

Claims 4 and 14

The Examiner has also rejected claims 4 and 14 under 35 USC 103(a) as being unpatentable over Stern in view of Kraft in further view of Meyerzon et al (US 2002/014637) ("Meyerzon"). Applicants respectfully traverse and request reconsideration of this rejection. As the Examiner is aware, Applicants addressed the Examiner's objections based on Stern in light of Kraft in further light of Meyerzon in the communication dated July 10, 2006. Applicants respectfully repeat and rely on the arguments raised in their communication of July 10, 2006, namely that the combination of subject matter of Stern and Meyerzon and Kraft does not rectify the deficiencies of Stern and Kraft, and resubmit that any advantages conferred by Meyerzon are completely ancillary to URL resolution and thus irrelevant given the points of distinction between the instant invention, Stern and Kraft, discussed above with regards to claim 1 on which these claims depend.

Declaration Pursuant to 37 C.F.R. §1.132

In addition to the arguments raised above, Applicants respectfully submit a Declaration of Craig Conboy pursuant to 37 C.F.R. §1.132 which provides additional discussion regarding the art cited by the Examiner.

Applicants believe that they have demonstrated that the subject matter claimed in the present application is patentably distinct from Stern in light of Kraft in further view of Garcia-Chiesa and Stern in view of Kraft and in further view of Meyerzon. Withdrawal of this objection under 35 USC 103(a) is respectfully requested.

Respectfully submitted,

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Date: February 26, 2007